



# LAW OFFICE of JULIA KEFALINOS

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July 30, 2020

**VIA CMECF**

Honorable Valerie E. Caproni  
United States District Court Judge  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007-1312

**MEMO ENDORSED**

Re: U.S. v. Maria Fernanda Gutierrez Ospino 20-cr-00102-VEC  
U.S. v. Jose Andre Urena Sancho 20-cr-00102-VEC

Dear Judge Caproni:

I write on behalf of my client, Maria Fernanda Gutierrez Ospino, joined by AFD Ariel Werner on behalf of her client, Jose Andre Urena Sancho, and with the consent of the Government to request a 30-day adjournment of the status conference scheduled for August 6, 2020 in the above referenced case for the following reasons:

1. Both defendants are working towards a resolution with the Government and would benefit from the additional time.
2. Ms. Gutierrez-Ospino recently gave birth and is nursing her baby. Due to the baby's age, it is unsafe for them to travel until the circumstances of the COVID 19 pandemic improve.
3. The uncertainty of the current travel restrictions and limitations on court proceedings and potential requirement to quarantine in New York State due to the COVID-19 pandemic. The defendant lives in Miami, Florida which is now the epicenter for COVID-19.

The parties' consent to the exclusion of time under the Speedy Trial Act through the next conference date scheduled by the court. Thank you for your consideration of this request.

Respectfully submitted,

/s/Julia Kefalinos, Esq

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cc: Ariel Werner AFD  
Samuel Rothschild, Assistant U.S. Attorney

Application GRANTED. The August 6, 2020, conference is adjourned to **September 3, 2020, at 11:00 A.M.** The Court is unlikely to adjourn that date any further. The Court will proceed via video conference if the parties make a request by **August 20, 2020**; absent such a request or a resolution of the case, the Court expects all parties to be in physical attendance on September 3, 2020.

For the reasons stated in the letter, the Court finds that interests of justice outweigh the interests in speedy trial; time shall be excluded from now until September 3, 2020.

SO ORDERED.

Date: 07/30/2020



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE